

# Exhibit 19

## North Carolina Proposals

**MDL 3047 – 2024-12-09 Agency Discovery JLB**  
**North Carolina – Meta Proposal**

**Search Terms:** Meta made its most recent counterproposal on December 5, 2024 to the North Carolina (i) Department of Health and Human Services, (ii) Department for Public Instruction, and (iii) Governor's Office. At a high level, Meta's proposal involves using search combinations that require "Social Media Terms," "Harm Terms," or "Other Factor" terms to occur "within 15" of one of the following "Youth Terms":

((gen OR generation) NEAR(2) (alpha OR "z")) OR teen\* OR tween\* OR adolescen\* OR kid\* OR youth\* OR minor\* OR young\* OR child\* OR underage\* OR "under-age" OR juvenile\* OR "pre-teen\*" OR preteen\* OR student\* OR pupil\* OR "U18" OR "under 18" OR "U13" OR "under 13" OR scholar\* OR School\* OR grade\*)

For the Department of Public Instruction, Meta agreed to remove the terms "student\*," "pupil\*," "scholar\*," "school\*," and "grade\*" from the "Youth Term" limitation set.

Meta and the North Carolina AG's office reached agreement in principle on the use of these terms and combinations.

#	Social Media Terms
1	<p>"Youth Terms" <b>w/15</b> ("Social media" OR "social network" OR "ephemeral content" OR "screen time" OR Meta OR FB OR Facebook OR IG OR Instagram OR Insta OR finsta OR Youtube OR YT OR TikTok OR TT OR SnapChat OR Snap OR YikYak OR "Yik Yak" OR Twitter OR Pinterest OR LinkedIn OR Twitch OR BeReal OR Lapse OR Reddit OR Threads OR Goodreads OR VSCO OR Quora OR Discord OR Tumblr OR Bytedance OR Tweet OR Roblox OR Netflix OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR DM* OR "direct message")</p> <p><i>NB: For the Department of Public Instruction, Meta agreed to remove the terms "Facebook," "Instagram," "Insta," "Youtube," and "Twitter" from this search string based on DPI's representation that those terms appear in agency e-mail signatures.</i></p>
2	<p>Harm Terms</p> <p>"Youth Terms" <b>w/15</b> (Depress* OR Anxi* OR Suicid* OR "Self-harm" OR "self harm" OR unalive OR "self injury" OR cutting OR "mental health" OR ((Disrupt* OR disturb* OR interrupt*) NEAR(3) notification*) OR (Body NEAR(2) (image OR dysmorphia OR dissatisfaction OR accept* OR positivity)) OR "self esteem" OR "self image" OR "Social appearance" OR ((negative OR social) NEAR(2) compar*) OR ((cognitive OR neuro* OR emotional OR social OR brain) NEAR(5) development) OR (advers* NEAR(2) experience*) OR (negative NEAR(2) (affect OR effect)) OR anorexi* OR bulimi* OR orthorexi* OR binge OR ((eat* OR sleep*) NEAR(3) (problem* OR issue* OR trouble* OR depriv*)) OR "pro-ana" OR appetite OR dysmorph* OR purge OR addic* OR hook* OR dopamine OR rabbithol* OR spiral OR screentime OR staytime</p>

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	OR timespent OR “time spent” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
<b>Other Factor Terms</b>	
3	“Youth Terms” <b>w/15</b> (screen OR “video game” OR gaming OR opio* OR opia* OR drug OR alcohol OR Covid* OR coronavirus OR pandemic OR lockdown OR "lock* down" OR quarantine OR (social* NEAR(2) distanc*) OR (violen* OR shoot* OR Abus* OR gun* OR Tobacco OR vape OR vaping OR JUUL OR cig* OR “ecig” OR “e-cig” OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR meth OR methamphetamine OR oxy OR oxycontin OR OR bully* OR cyberbull* OR harass* OR sextort OR NCII OR “non-consensual intimate imagery” OR CSAM OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR pedophil* OR predator* OR sex* OR exploit*)

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**Custodians:** Meta proposes that the above search terms be run on each agency's custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the "Relevant Time[]]" in Plaintiffs' Complaint. See ECF No. 969; MDL Compl. ¶ 19 (alleging a "Relevant Time[]]" that starts "no later than 2012").

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (\*) have been affirmatively proposed and agreed to by the North Carolina AG's office during the course of the Parties' negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

Agency	Custodian	Title
Dept. of Health & Human Services	Kelly Crosbie*	Director of Mental Health, Developmental Disabilities and Substance Use Services
Dept. of Health & Human Services	Janssen White*	Assistant Secretary for Government Affairs
Dept. of Health & Human Services	Karen Wade*	Policy Director
Dept. of Health & Human Services	Heather Strickland*	Senior Director, Office of Communications
Dept. of Health & Human Services	Yvonne Copeland*	Director, Division of Child and Family Well-Being
Dept. of Health & Human Services	Charlene Wong*	Assistant Secretary for Children and Families (former)
Dept. of Public Instruction	Karen Fairly*	Executive Director Center for Safer Schools
Dept. of Public Instruction	Matthew Mayo*	Director, Digital Learning and School Connectivity
Dept. of Public Instruction	Blair Rhodes*	Communication Director

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Dept. of Public Instruction	Lillie Rhodes*	Director, Office of Government Affairs
Governor's Office	Ziev Dalsheim Kahane*	Policy Advisor
Governor's Office	Geoff Coltrane*	Deputy Policy Director and Senior Education Advisor
Governor's Office	Kristen Guillory*	Policy Advisor
Governor's Office	Dayson Paison*	Policy Advisor

## **North Carolina's Search Term Proposal**

Meta and the North Carolina AG's office have reached an agreement in principle on the use of the below-described search terms terms, combinations of search terms, and custodians. Meta and the North Carolina AG disagree only as to the relevant time period for searches. The North Carolina AG proposes conducting searches using a time period of January 1, 2017, to March 28, 2024, which it initially proposed on October 28, rather than Meta's December 6 proposal to search for documents dating to January 1, 2012.

### Social Media Terms

(“Social media” OR “social network” OR “ephemeral content” OR “screen time” OR Meta OR FB OR Facebook OR IG OR Instagram OR Insta OR finsta OR Youtube OR YT OR TikTok OR TT OR SnapChat OR Snap OR YikYak OR “Yik Yak” OR Twitter OR Pinterest OR LinkedIn OR Twitch OR BeReal OR Lapse OR Reddit OR Threads OR Goodreads OR VSCO OR Quora OR Discord OR Tumblr)

*Note: Meta has agreed to remove the terms “Facebook,” “Instagram,” “Insta,” “Youtube,” and “Twitter” from this search string based because those terms appear in email signatures within DPI*

### Harm Terms

(Depress\* OR Anxi\* OR Suicid\* OR “Self-harm” OR “self harm” OR unalive OR “self injury” OR cutting OR “mental health” OR ((Disrupt\* OR disturb\* OR interrupt\*) NEAR(3) notification\*) OR (Body NEAR(2) (image OR dysmorphia OR dissatisfaction OR accept\* OR positivity)) OR “self esteem” OR “self image” OR “Social appearance” OR ((negative OR social) NEAR(2) compar\*) OR ((cognitive OR neuro\* OR emotional OR social OR brain) NEAR(5) development) OR (advers\* NEAR(2) experience\*) OR (negative NEAR(2) (affect OR effect)) OR anorexi\* OR bulimi\* OR orthorexi\* OR binge OR ((eat\* OR sleep\*) NEAR(3) (problem\* OR issue\* OR trouble\* OR depriv\*)) OR “pro-ana” OR appetite OR dysmorph\* OR purge OR addic\* OR hook\* OR dopamine OR rabbithol\* OR spiral OR screentime OR staytime OR timespent OR “time spent” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)

### Youth Terms

((gen OR generation) NEAR(2) (alpha OR "z")) OR teen\* OR tween\* OR adolescen\* OR kid\* OR youth\* OR minor\* OR young\* OR child\* OR underage\* OR “under-age” OR juvenile\* OR “pre-teen\*” OR preteen\* OR student\* OR pupil\*)

*Note: Meta agreed to remove the terms “student\*,” “pupil\*,” “scholar\*,” “school\*,” and “grade\*” from the “Youth Term” limitation set.*

### Other Factor Terms

(screen OR “video game” OR gaming OR opio\* OR opia\* OR lockdown OR “lock\* down” OR quarantine OR (social\* NEAR(2) distanc\*) OR Tobacco OR vape OR vaping OR JUUL OR cig\* OR “ecig” OR “e-cig” OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent\* OR meth OR methamphetamine OR oxy OR oxycontin OR cyberbull\* OR sextort OR NCII

OR “non-consensual intimate imagery” OR CSAM OR transphob\* OR homophob\* OR racis\* OR sexis\* OR pedophil\* OR predator\*)

Search Term Combinations for All Agencies

Youth Terms NEAR(15) Social Media Terms

Youth Terms NEAR(15) Harm Terms

Youth Terms NEAR(15) Other Factor Terms

Custodians

- Department of Public Instruction
  - Karen Fairly – Executive director Center for Safer Schools
  - Matthew Mayo – Director, Digital Learning and School Connectivity
  - Blair Rhodes – Communication Director
  - Lillie Rhodes – Director, Office of Government Affairs
- DHHS
  - Kelly Crosbie, Director of Mental Health, Developmental Disabilities and Substance Use Services
  - Janssen White, Assistant Secretary for Government Affairs
  - Karen Wade, Policy Director
  - Heather Strickland, Senior Director, Office of Communications
  - Yvonne Copeland, Director, Division of Child and Family Well-Being
  - Charlene Wong, Assistant Secretary for Children and Families (former)
- Governor’s Office
  - Ziev Dalsheim-Kahane, Policy Advisor, Governor Roy Cooper
  - Geoff Coltrane, Deputy Policy Director and Senior Education Advisor
  - Kristen Guillory, Policy Advisor, Governor Roy Cooper
  - Dayson Paison, Policy Advisor, Governor Roy Cooper

Date range for Searches

- January 1, 2017 as the beginning date and March 28, 2024 as the end date.

Additional Targeted “Go-Get” Searches

- Requests 5, 7, 8, 12, 14, 15, 16, 17, 18, 19, 20, 28, 31, 34, 35 (limited to published actions, programs, initiatives etc.), 44, 45 from Meta’s First Requests for Production to North Carolina
- Requests 1 and 2 from Meta’s Second Requests for Production to North Carolina (regarding DHHS)